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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

MEDURI FARMS, INC., an Oregon
corporation,

Plaintiff,

v.

DUTCHTECSOURCE BV, a corporation
of the Netherlands,

Defendant.

Case No. 3:17-cv-00906-SI

SUPPLEMENTAL DECLARATION OF
JUSTIN WAKKER IN SUPPORT OF
DEFENDANT'S MOTION TO REFER
PARTIES TO ARBITRATION AND STAY
PROCEEDINGS



I, Justin Wakker, hereby declare as follows:

1. I am a citizen of the Netherlands and am the person in charge of Dutch TecSource B.V. ("DTS"), the defendant in this action. I am also the person at DTS who was primarily responsible for negotiating the agreement between DTS and plaintiff Meduri Farms, Inc. ("Meduri") for purchase of the infusion line referenced in this declaration. I make this supplemental declaration in support of DTS's Motion to Refer Parties to Arbitration and Stay Proceedings ("Motion") and DTS's Reply in support of that Motion. I am competent to testify to the matters stated herein and either have personal knowledge of the facts set forth below or they are from sources deemed reliable.

2. The August 24, 2015 price Quotation for two infusion lines (the "August Quotation") was a 33-page long document that spells out all the product details and technicalities of the two infusion lines to be sold to Meduri. Without it, Meduri would not have known what it was purchasing from DTS.

3. The September 16, 2015 "Price Overview" that was sent to Meduri was intended to replace the price overview that was contained in the August Quotation. The price overview in the August Quotation was "Euro 5,810,000,00." Declaration of Justin Wakker in Support of Defendant's Motion to Refer Parties to Arbitration and Stay Proceedings, Ex. A at 32. ("Wakker Decl") (Dkt. 11). The September Price Overview simply divided that number in half—"Euro 2,964,000,00."

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of

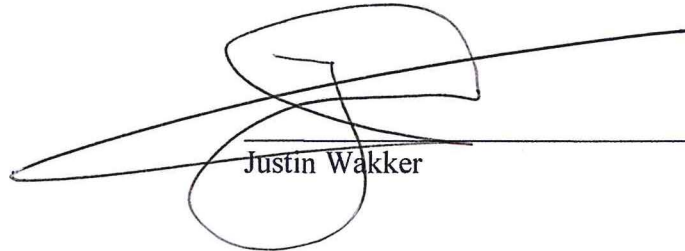
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the United States of America that the foregoing is true and corrected.

Executed on this 5th day of September, 2017, in Beusichem, the Netherlands.



Justin Wakker



CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on:

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Attorneys for Plaintiff Meduri Farms, Inc.

by the following indicated method or methods on the date set forth below:

- ☒ **CM/ECF system transmission.**
- ☐ **E-mail.** (Courtesy copy.)
- ☐ **E-mail.** As required by Local Rule 5-11, any interrogatories, requests for production, or requests for admission were e-mailed in Word or WordPerfect format, not in PDF, unless otherwise agreed to by the parties.
- ☐ **Facsimile communication device.**
- ☐ **First-class mail, postage prepaid.**
- ☐ **Hand-delivery.**
- ☐ **Overnight courier, delivery prepaid.**

DATED: September 6, 2017.

s/ M. Christie Helmer

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Of Attorneys for Defendant Dutch TecSource BV